



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

AAS/ICR  
F. #2015R01787

*271 Cadman Plaza East  
Brooklyn, New York 11201*

October 15, 2018

By ECF and Hand Delivery

The Honorable Dora L. Irizarry  
Chief United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Dan Zhong  
Criminal Docket No. 16-614 (DLI)

Dear Chief Judge Irizarry:

The government respectfully writes to apprise the Court of the following. Rilin counsel has informed the government that none of the Witnesses, the Employees, or the Newark Workers referenced in the government's opposition brief dated October 9, 2018 are willing to travel to the United States to testify at trial, even when offered safe passage by the government.

Respectfully submitted,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/ Alexander A. Solomon  
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cc: Defense counsel (by ECF)